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April 3, 2025

VIA ECF

Honorable Mary Kay Vyskocil  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Courtroom 18C  
New York, NY 10007

Re: Joseph Reiver v. The City of New York  
Case No. 25-cv-01376 (MKV)(GS)

Your Honor:

We represent plaintiff Joseph Reiver in the above captioned action. Pursuant to Section 4.A.i of the Court's Individual Practices, plaintiff files this letter responding to defendant's letter, dated March 31, 2025, requesting a pre-motion conference to discuss an anticipated pre-answer motion to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6).

Plaintiff does not oppose defendant's right to make the contemplated motion but reserves the right to oppose it, if and when it is filed, in accordance with the terms of a briefing schedule mandated by this Court.

Respectfully submitted,

  
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MCLAUGHLIN & STERN, LLP  
Attorneys for Plaintiff

  
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Attorneys for Plaintiff